

To: Cohen, Lori[Cohen.Lori@epa.gov]; Yamamoto, Deb[Yamamoto.Deb@epa.gov]; Cora, Lori[Cora.Lori@epa.gov]
Cc: Sheldrake, Sean[sheldrake.sean@epa.gov]
From: Koch, Kristine
Sent: Wed 7/30/2014 12:52:44 AM
Subject: FW: Portland Harbor RI Section 10 Comments
Koch_2012-01-13_DF RI_Sec10_Text.doc
2014_07_29_EPA Comment Letter on 2011 RI Report Sections 10.pdf

FYI... I've transmitted the final section of the RI to the LWG. Hopefully we'll have this wrapped up by the end of August. So far, negotiations on Section 5 are going well. I expect that the edits to this section may put them over the edge. Only time will tell. Stay tuned.

Kristine Koch
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From: Koch, Kristine
Sent: Tuesday, July 29, 2014 5:49 PM
To: 'James McKenna'; Bob Wyatt (rjw@nwnatural.com)
Cc: Jennifer Woronets; Sheldrake, Sean (sheldrake.sean@epa.gov)
Subject: Portland Harbor RI Section 10 Comments

Bob and Jim – Attached are the modifications EPA has made to Section 10 with an unsigned transmittal letter. We have incorporated Section 11 modifications of the August 29, 2011 Draft Final at the end of this Section. I'll bring a signed version of the letter to you on Thursday. The LWG has until August 29, 2014, to identify and resolve issues it has with this section of the RI. As requested, EPA is authorizing the extension of the LWG's review periods for Section 5 of the RI and Section 1 of the FS until August 29, 2014, to allow the LWG the opportunity to review these sections simultaneously. However, I expect that we will continue to meet and resolve issues already identified by the LWG on these sections. Please note that I do not expect to transmit comments/edits to the References for the RI report. EPA expects that the LWG will ensure that the revised Draft Final RI will provide the appropriate references for the report, which should only identify references for the report itself and not for the appendices (which

should have their own references). After we have resolved all issues with Sections 5 and 10 of the RI, we will send you a revised Executive Summary for the RI report.

Regards,

Kristine Koch
Remedial Project Manager
USEPA, Office of Environmental Cleanup

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From: James McKenna [<mailto:jim.mckenna@verdantllc.com>]
Sent: Monday, July 28, 2014 4:17 PM
To: Koch, Kristine
Cc: Jennifer Woronets; Bob Wyatt (rjw@nwnatural.com); Gene Revelas (grevelas@integral-corp.com); Carl Stivers (cstivers@anchorqea.com); Patty Dost (pdost@pearllegalgroup.com)
Subject: RE: Portland Harbor Action Items from July 24 FS Section 1 Call

Good afternoon Kristine. The LWG requests we align the informal dispute review cycles for RI Section 5 and FS Section 1 to coincide with RI Section 10 (i.e., the informal dispute cycles for RI Section 5 and FS Section 10 will be extended to match the 30-day cycle for RI Section 10).

We look forward to receiving the draft revised RI Section 10 later today or tonight.

Thanks,

Jim McKenna

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From: Koch, Kristine [<mailto:Koch.Kristine@epa.gov>]

Sent: Monday, July 28, 2014 3:57 PM

To: James McKenna

Cc: Jennifer Woronets

Subject: FW: Portland Harbor Action Items from July 24 FS Section 1 Call

Jim – I just tried to call, but you weren't available, so I'm sending you an email. I was wondering if the LWG was going to request and extension of time on FS Section 1 and RI Section 5 to be concurrent with their review of RI Section 10. I have Section 10 modifications ready to transmit, but I was waiting on a response from the LWG. If I don't hear from you by COB tomorrow regarding a schedule extension, I'm going to send out RI Section 10 edits without schedule extensions for the other sections and deal with the schedule separately.

Regards,

Kristine Koch
Remedial Project Manager
USEPA, Office of Environmental Cleanup

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From: Koch, Kristine
Sent: Monday, July 28, 2014 9:52 AM
To: 'Jennifer Woronets'
Cc: Amanda Shellenberger; Bob Wyatt; Carl Stivers; Jim McKenna (jim.mckenna@verdantllc.com); King, Todd W.; Mullin, Jeanette; Patty Dost; Scott Coffey (coffeuse@cdmsmith.com); Sheldrake, Sean
Subject: RE: Portland Harbor Action Items from July 24 FS Section 1 Call

I want to make it clear that the proposal for extension of time for LWG on FS section 1 and RI Section 5 to coincide with Section 10 was at the request of the LWG – I was just amenable to the request. If the LWG is not willing to make that request, then I'm not amenable to granting the extension. Please let me know if the LWG is requesting the extension.

Regards,

Kristine Koch
Remedial Project Manager
USEPA, Office of Environmental Cleanup

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From: Jennifer Woronets [<mailto:jworonets@anchorqea.com>]
Sent: Friday, July 25, 2014 10:39 AM
To: Koch, Kristine
Cc: Amanda Shellenberger; Bob Wyatt; Carl Stivers; Jennifer Woronets; Jim McKenna (jim.mckenna@verdantllc.com); King, Todd W.; Mullin, Jeanette; Patty Dost; Scott Coffey (coffeuse@cdmsmith.com); Sheldrake, Sean
Subject: Portland Harbor Action Items from July 24 FS Section 1 Call

Kristine,

Please see below from Carl.

Below are action items captured from our call yesterday regarding EPA's Draft FS Section 1.

1. EPA proposed to extend the LWG FS Section 1 and RI Section 5 review/resolution deadlines to coincide with the upcoming RI Section 10 review schedule. The extension will be to 30 days after receipt of EPA's changes to the RI Section 10.
2. EPA will transmit an updated outline of the FS that will provide additional detail regarding where specific information and concepts will be presented and discussed.
3. EPA will provide some language associated with transmittal of the next version of the PRG table to indicate additional context for the PRGs (e.g., the table will clearly differentiate sediment PRGs as remediation goals from the water and tissue "target levels").
4. EPA and LWG will discuss soon appropriate replacement values for SWAC calculations.
5. EPA informed LWG that DEQ is developing a "source control companion document" with assistance from the City. EPA intends that this document will be referenced in the FS. EPA did not know the name of the document or details of its contents and suggested LWG to ask Rick Muza and DEQ about it.
6. EPA will consider additional edits to Section 1.2.2.2 to capture context of sources discussed today (e.g., FS assumes that sources are controlled, groundwater is summarized because it may impact cap decisions, bank conditions are summarized because EPA may include those in the Site in the future).
7. LWG to submit specific errors or questions identified for the groundwater and bank source descriptions.
8. LWG to review example sediment concentration maps (attached) to see if our concerns are resolved or not. LWG to submit specific type of preferred map(s) if necessary.
9. EPA will supply the LWG the current version of the database they are using for FS evaluations.

- a. LWG to review database to determine what is included/excluded and perform a QC.
10. EPA will add a new subsection describing the database (Section 1.3).
 11. LWG will submit specific edits to the risk assessment summaries to add appropriate context.

Please review and confirm the list of action items.

Let me know if you have any questions.

Carl

Thank you,

Jen Woronets ☺

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